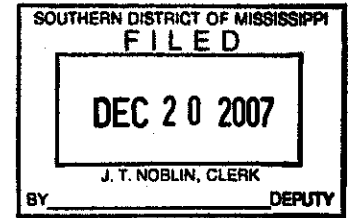


IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF MISSISSIPPI  
SOUTHERN DIVISION



TANYA DENISE STEWART

PLAINTIFF

VS.

CIVIL ACTION NO. 1:07cv1270 LG-LHW

JOHNNIE MAE PERRY

DEFENDANTS

**JACKSON COUNTY, MISSISSIPPI**  
SINGING RIVER HOSPITAL SYSTEMS  
SINGING RIVER HOSPITAL  
OCEAN SPRINGS HOSPITAL  
JOSEPH P. VICE, MD  
GREGORY HORN, MD  
OCEAN SPRINGS POLICE DEPARTMENT  
DEPARTMENT OF HEALTH AND HUMAN SERVICES

**HARRISON COUNTY, MISSISSIPPI**  
DEPARTMENT OF HEALTH AND HUMAN SERVICES  
FAMILY AND CHILDREN SERVICES  
DEANNA CHASE  
LANA M. HODA  
BILOXI POLICE DEPARTMENT

**HARRISON COUNTY YOUTH COURT, MISSISSIPPI**  
FAMILY COURT, YOUTH COURT OF HARRISON COUNTY, MISSISSIPPI  
MICHAEL H. WARD, YOUTH COURT JUDGE  
HERBERT WILSON, YOUTH COURT PROSECUTOR  
ANGELIQUE WHITE, GUARDIAN AD LITEM

**COMPLAINT**

COMES NOW, plaintiff, TANYA DENISE STEWART, ET AL, pro se, and for cause of action against the defendants listed above, would state the 1983 CIVIL RIGHTS ACT, was violated under color of law, specifically, RIGHT TO DUE PROCESS. Further more, the listed defendants conspired against the plaintiff with malicious intent to obfuscate the wrongful abduction of plaintiff's newborn child. One, Brendon Francis Perry, born November 29, 2006.

## JURISDICTION

This matter is one that involves two counties, two Police Departments, Doctors, Hospitals, Inferior Courts and a government entity that used nothing more than hear say to remove the 48 hour newborn from his mother, the plaintiff. Due to the number of municipalities involved and positions of power held by the defendants; Plaintiff affirms that Federal intercession is warranted.

### I.

Plaintiff is an adult resident citizen of the County of Harrison, State of Mississippi. The defendant, Johnnie Mae Perry, is an adult resident citizen of Harrison County, State of Mississippi.

## FACTS

This case began with the birth of Brendon Francis Perry on November 29, 2006, to Tanya Denise Stewart. On Dec. 1, 2006, 48 hours after his birth, the newborn was taken from his Mother, Tanya Denise Stewart, at Ocean Springs Hospital, by Deanna Chase, Harrison County D.H.S. stating that she had a judges' verbal order to do so. Ocean Springs Hospital Security Officer told Tanya Denise Stewart, that if she was to act up, that he would have to tell the judge.

The Department of Health and Human Services had been contacted by the mother of Tanya Denise Stewart, Johnnie Mae Perry, who claimed that she was on drugs and should not be allowed to retain custody of her child. Although Tanya Denise Stewart had no history of drug use, nor any police record, D.H.S. of Harrison County believed the lies told by Johnnie Mae Perry. With the co-operation of Ocean Springs Hospital, who used their Security Officer to escort the birth parents out of the hospital before giving the child to Johnnie Mae Perry, she was given the newborn.

Brendon Francis Perry has been, thus far, held for more than one year, by Johnnie Mae Perry, with the cooperation of D.H.S. Harrison County. Johnnie Mae Perry told these Falsehoods for the purpose of obtaining custody so she could get another government check. The baby was born in Jackson County at (Ocean Springs Hospital); yet D.H.S. of Harrison County has usurped jurisdiction. Tanya Stewart was never charged with a crime by D.H.S. or Police; so that her newborn was abducted by D.H.S without authority or jurisdiction. Johnnie Mae Perry retains custody of Brendon Francis Perry at present. She continues to fraudulntly receive government funds for his care.

### RELIEF

1.) Immediate return of the child, Brendon Francis Perry, to his rightful birth parents George Peter Kelly, Jr. and Tanya Denise Stewart.

2.) Dismissal of the false charges of kidnapping which have been brought up against the same birth parents, George Peter Kelly, Jr and Tanya Denise Stewart

3.) Refund of all legal expenses and bail monies paid by birth parents Kelly and Stewart.

These are estimated at 15,000 thus far. Also, compensation for the anguish caused these birth parents. Their child was taken form them at the hospital 48 hours after his birth based upon slanderous allegations from Johnnie Mae Perry which were completely false. Birth parents have been forcibly separated from their first born child, for more than one year, for no reason whatsoever. They deserve compensation from all persons and government entities involved in this conspiracy.

Tanya Denise Stewart  
220 Bohn St.  
Biloxi, Ms 39530  
(228) 257-8517

 12-20-07

Exhibit A - Normal Newborn Report

Exhibit B - Singing River Systems  
Refunded The Money for my birth  
at their Hospital Ocean Springs